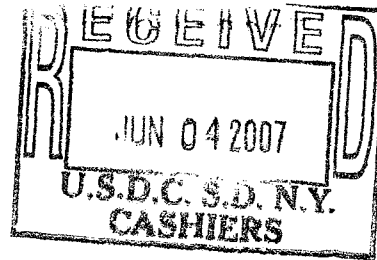


Michael J. Frevola (MJF 8359)
HOLLAND & KNIGHT LLP
195 Broadway
New York, NY 10007-3189
(212) 513-3200



ATTORNEYS FOR PLAINTIFF
BROCHART KB

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE DANIELS

BROCHART KB,

Plaintiff,

-against-

VILSONS SHIPPING PVT LTD,

Defendant.

07 CIV 4729
07 Civ. _____

VERIFIED COMPLAINT

Plaintiff, Brochart KB ("Brochart"), by and through its attorneys, Holland & Knight LLP, for its verified complaint against Vilsons Shipping Pvt Ltd ("Vilsons"), alleges, upon information and belief, as follows:

1. This is a case of admiralty and maritime jurisdiction as hereinafter more fully appears and is a maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure.

2. At all times material herein, plaintiff Brochart was and is a business entity organized and existing under the laws of Sweden and maintains a place of business at Strandvägen 25 C, 191 35 Sollentuna, Sweden and was the owner of the M/V PONTOKRATIS at all times material to this Complaint.

3. Upon information and belief, at all times material herein, defendant Vilsons Shipping Pvt Ltd. is a business entity organized and existing under the laws of India, with a principal place of business located at A3 Vilsons Plaza, World Trade Avenue, Tuticorin 628004, India, and was the charterer of the M/V PONTOKRATIS.

4. During a port call of the M/V PONTOKRATIS at Cochin, India from September 7, 2007 through October 5, 2007, Brochart purchased bunkers on behalf of Vilsons in the amount of US\$37,470.

5. Under an agreement between the parties (the "Agreement"), the amount of US\$37,470 should have been reimbursed by Vilsons, and Vilsons has accepted its liability to Brochart as such.

6. On April 24, 2007 Vilsons provided a partial payment to Brochart in the amount of US\$11,876, stating in an email received April 21, 2007:

Sir,
Pls find attached tt slip for US\$ 11.896 being payment for bunker refund. The balance will be paid in the next transfer by us in our [sic] before 5th May. Kindly bear with us the inconveniences which is due to paucity of funds. Plse note we have no intention to hold your money and will remitted [sic] the balance and close the acct.

A true and correct of the email quoted above is attached as Exhibit 1.

7. The actual credit to Brochart's bank account was US\$11,876. A true and correct copy of the bank-slip showing the US\$11,876 credit to Brochart's bank account is attached as Exhibit 2.

8. Upon information and belief, the difference between Vilsons' purported payment (US\$11,896) and the actual amount credited to Brochart's bank account (US\$11,876) was due to fees charged by the bank(s) involved in the transaction.

9. The bank-slip for the payment of \$US11,876 to Brochart states that the remitter is "Vilsons Shipping Pvt Ltd." (Exhibit 2).

10. In addition, the bank-slip sets forth the purpose of the payment:

DETAILS OF PAYMENT:
REFUND OF MONEY FOR SUPPLY OF
BUNKER TO VESSEL MV PONTOKRATIS
BNY CUST RRN – FT0704239407400

(Exhibit 2).

11. Vilson has accepted liability for the costs relating to the purchase of the bunkers in Cochin, India.

12. Vilson promised to pay the balance owed to Brochart, totaling US\$25,594, and then reneged. A true and correct copy of the emails containing Vilsons' promises to pay the outstanding amount due Brochart is attached as Exhibit 3.

13. Vilsons' refusal to reimburse Brochart for the bunkers Brochart purchased and for which Vilsons is liable constitutes a breach of the Agreement between Vilsons and Brochart.

14. As a result of the foregoing, Vilsons is liable to Brochart in the principal sum of US\$25,594, exclusive of interest, costs and reasonable attorneys' fees. Brochart also is entitled to receive its interest, expenses and reasonable attorneys' fees for prosecuting its claims to completion, which amount is estimated to be \$34,223.01, as set forth below:

Interest: \$ 4,223.01 ($\$25,594.00 \times 0.0825/\text{year} \times 2 \text{ years}$)

Attorneys' Fees/Expenses: \$30,000.00

Total: \$34,223.01

15. Vilsons is not found within the Southern District of New York but does have assets, good or chattels within the jurisdiction, to wit: funds or accounts held in the name (or names) of Vilsons Shipping Pvt Ltd. with, upon information and belief, the following financial institutions: Bank of America, N.A.; The Bank of New York; Citibank, N.A.; Deutsche Bank Trust Company Americas; HSBC Bank USA, N.A.; JPMorgan Chase Bank, N.A.; UBS AG; Wachovia Bank, N.A.; Société Générale; Standard Chartered Bank; BNP Paribas; Calyon Investment Bank; American Express Bank; Commerzbank; ABN Amro Bank; Bank Leumi USA; Fortis Financial Groups; Banco Popular; or any other financial institution within the Southern District of New York.

WHEREFORE, Brochart demands judgment as follows:

1. That process in due form of law according to the practice of this Court in the form of a writ of maritime attachment be issued against bank accounts and other property of Vilsons Shipping Pvt Ltd. with the financial institutions noted above in paragraph 15;

2. That Vilsons Shipping Pvt Ltd. and any other person claiming an interest therein may be cited to appear and answer the matters aforesaid;

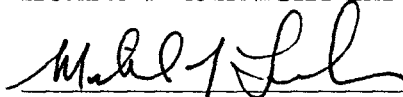
3. That judgment be entered in favor of Brochart KB and against Vilsons Shipping Pvt Ltd. in the amount of US\$59,817.01 (including estimated interest, expenses and attorneys' fees); and,

4. That this Court grant Brochart KB such other and further relief which it may deem just and proper.

Dated: New York, New York
June 4, 2007

HOLLAND & KNIGHT LLP

By:

A handwritten signature in black ink, appearing to read "Michael J. Frevola", written over a horizontal line.

Michael J. Frevola (MJF 8359)

195 Broadway

New York, NY 10007-3189

Tel: (212) 513-3200

Fax: (212) 385-9010

Attorneys for Plaintiff

Brochart KB

VERIFICATION

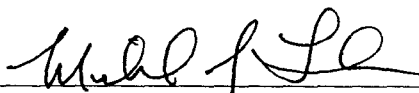
STATE OF NEW YORK)

:ss.:

COUNTY OF NEW YORK)

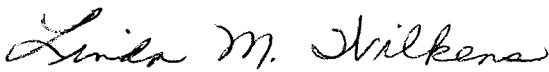
MICHAEL J. FREVOLA, being duly sworn, deposes and says:

I am a member of the firm of Holland & Knight LLP, counsel for Brochart KB ("Brochart"), plaintiff in the foregoing action. I have read the foregoing Verified Complaint and know the contents thereof, and the same are true and correct to the best of my knowledge. I have reviewed documentation provided to me by Brochart and corresponded with Brochart's representatives regarding this matter. I am authorized by Brochart to make this verification, and the reason for my making it as opposed to an officer or director of Brochart is that there are none within the jurisdiction of this Honorable Court.



Michael J. Frevola (MJF 8359)

Sworn to before me this
4th day of June, 2007



Notary Public

Linda M. Wilkens
Notary Public, State of New York
No. 01W19672455
Qualified in Queens County
Certificate filed in New York County
Commission Expires September 30, 2010

EXHIBIT 1

Lasse Brautaset

From: Info Bruker
Sent: 25. april 2007 10:02
To: Lasse Brautaset
Cc: Anne Mette Mevik
Subject: FW: Pontokratis
Attachments: Mail0192.PDF

From: Brodin [mailto:chartering@brodin.se]
Sent: 25. april 2007 09:58
To: Info Bruker
Subject: Pontokratis

From: Olof Brodin (Chartering) AB
Phone: +46-8-92 68 90
T-fax: +46-8-92 67 83
E-mail: chartering@brodin.se

Attn Lasse Barautaset, pse

M/v ***Pontokratis***

Ref telcon, we received (21 April) the following e-mail from Messrs Vilson, Cochin, India:

Qte

Sir,

Pse find attached tt slip for US\$ 11.896 being payment for bunker refund. The balance will be paid in the next transfer by us in our before 5th May. Kindly bear with us the inconveniences which is due to paucity of funds. Plse note we have no intention to hold your money and will remitted the balance and close the acct.

Regards Celestine

Unquote

There was no tt-slip attached. However we received yesterday the attached bank-slip from Skandinaviska Enskilda Banken advising us of the credit to our bank-account of US\$ 11.876 (US\$ 20 short, however I suppose that this is due to the fact that the bank(s) must also make living).

25.04.2007

I suggest we now wait until 5 May (which incidentally is a Saturday) and if the balance has not been received by Monday, 7 May Cob Stockholm then let's fire away with the heavy artillery - dont you think?

Kind regards
Akke

25.04.2007

EXHIBIT 2

To:

From: S E B

Fax:

LTOPCALL at: 07-04-24-11:23 Doc: 014 Page: 001

SEB

SKANDINAVISKA ENSKILDA BANKEN

Kreditavi / Credit Advice

9993

Vi krediterar ert konto för överföring från nedannämnda uppdragsgivare. Om ni önskar disponera beloppet på annat sätt var god kontakta det kontor som för ert konto.

We credit your account for transfer from the party mentioned below. If you wish to dispose of the account in another way please contact the office carrying the account.

Ort, datum / Place, date STOCKHOLM 07-04-24	Ci nr 5841	Verification / Voucher 042431359993	Ref FTS0704239407400
Betalningsmottagare / Beneficiary BROCHART KOMMANDITBOLAG STRANDVÄGEN 25 C 191 35 SOLLENTUNA		Uppdragsgivande bank / Ordering bank THE BANK OF NEW YORK US-NEW YORK N.Y. 10286	
Utlandskt belopp / Foreign amount USD*****11.876,00		Kurs / Rate **6,739200	
Kronor / SEK *****80.034,74		Provision / Commission ***60/CH	
Ursprungligt beordrat belopp / Orderd amount USD*****11.896,00		Nettobelopp / Net amount USD*****11.876,00	
Valutadag / Value Date 07-04-24			
Meddelande / Message <div style="display: flex; justify-content: space-between;"> <div> REMITTER: VILSONS SHIPPING PVT LTD. </div> <div> DETAILS OF PAYMENT: REFUND OF MONEY FOR SUPPLY OF BUNKER TO VESSEL MV PONTOKRATIS BNY CUST RRN - FTS0704239407400 </div> </div>			

Ert organisations-/ personnummer

969673-1398

EXHIBIT 3

Anders Evje

From: Vilship Chartering-India (Mr.Celestine) [chartering@vilship.com]
Sent: 8. mai 2007 09:43
To: Lasse Brautaset
Subject: Re: 20071415 B - Pontokratis

sir,

remmitances will be sent on 10th may for bunker due as informed by us earlier.

please check ur bank on 11/12th may for remmitances.

tk's & rgds celestine

----- Original Message -----

From: "Lasse Brautaset" <lbrautaset@nordisk.no>
To: <vilship@sancharnet.in>; <agency@vilship.com>; <celestine@vilship.com>
Sent: Monday, May 07, 2007 6:05 PM
Subject: 20071415 B - Pontokratis

Anders Evje

From: Vilship Chartering-India (Mr.Celestine) [chartering@vilship.com]
Sent: 9. mai 2007 07:50
To: Lasse Brautaset
Subject: Re: 20071415 B - Pontokratis

SIR

PLEASE NOTE TOMORROW WE WILL SUBMIT MONEY TO BANK FOR TRANSFER AND THEY WILL DO THE TRANSFER AND ONCE IT IS DONE A TT SLIP WILL COME. TT IS DONE AT LATE EVENING AND SLIP GIVEN NEXT DAY. FOR INSTANCES IN THE LAST TRANSFER THEY HAD A LINE PROBLEM AND SWIFT COULD NOT BE DONE FOR A DAY AND IN THE NEXT DAY THEY SENT IT.

RGDS CELESTINE

----- Original Message -----

From: "Lasse Brautaset" <lbrautaset@nordisk.no>
To: "Vilship Chartering-India (Mr.Celestine)" <chartering@vilship.com>
Sent: Tuesday, May 08, 2007 1:27 PM
Subject: RE: 20071415 B - Pontokratis

Celestine,

Thanks for your message.

Please understand that all I want is to get this matter sorted out with a minimum of disruption and hassle for all concerned.

We are now in the process of lining up the paperwork to be used to obtain an attachment order in New York. We would of course like to suspend this effort if we are assured that the funds will be paid on May 10.

If you want us to suspend any further action, we need to see a copy of your irrevocable payment instructions to your bank within Thursday May 10. If the funds are transferred as you say you should be in a position to provide this confirmation to us.

We look forward to resolving this matter as aforesaid.

Lasse Brautaset

Nordisk Legal Services
+47 22 13 56 00 (tel)
+47 91 53 56 04 (mobile)
+47 22 43 00 35 (fax)

E-mail: lbrautaset@nordisk.no

This e-mail and any attachments are confidential and may be legally privileged. They are intended only for the use of the named recipient. If you are not the named or intended recipient, please notify us immediately. In such an event, you should not disclose the contents of this e-mail or any attachments to any other person, nor copy, print, store or use them in any manner whatsoever. The integrity and security of this e-mail cannot be guaranteed on the Internet. Although we have taken precautions to minimize the risk of transmitting software viruses, you are advised to carry out your own virus checks on any attachments to this message. Thank you for your co-operation.

-----Original Message-----

From: Vilship Chartering-India (Mr.Celestine)
[mailto:chartering@vilship.com]
Sent: 8. mai 2007 09:43
To: Lasse Brautaset
Subject: Re: 20071415 B - Pontokratis

sir,

remittances will be sent on 10th may for bunker due as informed by us earlier.

please check ur bank on 11/12th may for remittances.

tnks & rgds celestine

----- Original Message -----

From: "Lasse Brautaset" <lbrautaset@nordisk.no>
To: <vilship@sancharnet.in>; <agency@vilship.com>;
<celestine@vilship.com>
Sent: Monday, May 07, 2007 6:05 PM
Subject: 20071415 B - Pontokratis